

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to: Ashton v. Al Qaeda Islamic Army  
Case No. 02 CV 6977 (RCC)

Burnett v. Al Baraka Investment and Development Corp.  
Case No. 03 CV 9849 (RCC)

Federal Insurance Co. v. Al-Qaida  
Case No. 03 CV 6978 (RCC)

**MOTION FOR ADMISSION PRO HAC VICE**

PLEASE TAKE NOTICE that pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, and on the basis of the affidavits attached hereto, and the Good Standing Certificates annexed thereto, the undersigned hereby moves the Court, before the Honorable Richard C. Casey, U.S.D.J., at the United States District Court, Southern District of New York, 500 Pearl Street, New York, NY 10007, at a date and time to be determined by the Court for an order admitting Jay D. Hanson and Christopher J. Beal, *pro hac vice*, as counsel for defendants:

(a) African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc, Reston Investments, Inc., Safa Trust, and York Foundation in Case No. 03 CV 9849 (RCC);

(b) International Institute of Islamic Thought in Case No. 02 CV 6977 (RCC); and

(c) African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc., Reston Investments, Inc., Safa Trust, York Foundation, Sterling Management Group, Inc., Sterling Charitable Gift Fund,

Inc., Mena Investments, Inc., Sana-bell, Inc., Jamal Barzinji, Iqbal Unus, Muhammad Ashraf, M. Omar Ashraf, Taha Jaber Al-Alwani, and M. Yaqub Mirza in Case No. 03 CV 6978 (RCC).

Dated: August 24, 2004

GRAY CARY WARE & FREIDENRICH LLP

/s/ Nancy Luque

NANCY LUQUE, ESQ. (NL-1012)

Gray Cary Ware & Freidenrich LLP

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Washington, DC 20036

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**AFFIDAVIT OF JAY D. HANSON**

JAY D. HANSON, being duly sworn, deposes and says:

1. I am a partner in the law firm of Gray Cary Ware & Freidenrich LLP, attorneys for defendants African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc, Reston Investments, Inc., Safa Trust, and York Foundation (Case No. 03 CV 9849 (RCC)); International Institute of Islamic Thought (Case No. 02 CV 6977 (RCC)); and African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc., Reston Investments, Inc., Safa Trust, York Foundation, Sterling Management Group, Inc., Sterling Charitable Gift Fund, Inc., Mena Investments, Inc., Sana-bell, Inc., Jamal Barzinji, Iqbal Unus, Muhammad Ashraf, M. Omar Ashraf, Taha Jaber Al-Alwani, and M. Yaqub Mirza (Case No. 03 CV 6978 (RCC)).

2. I submit this Affidavit in support of my application to be admitted to practice before this Court and represent the above defendants, *pro hac vice*.

3. I am a member in good standing of the Bar of the Southern District of California, having been admitted to practice before that bar on January 20, 1990. A certificate of good

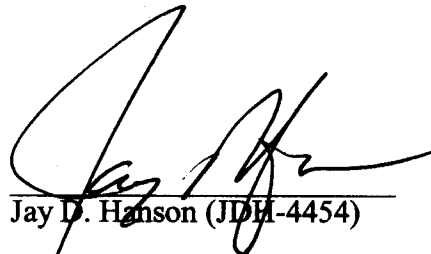
standing from that bar is attached hereto. I am admitted to practice law in the State of California and am an active member of the bar of that state.

4. I am not presently nor have I ever been suspended, disbarred, or otherwise disciplined in any of the courts or jurisdictions where I have been admitted to practice.

5. I certify that I have read and am familiar with the Local Rules of this District and the Federal Rules of Civil Procedure, and I agree to comply with and be bound by those rules.

6. I am not a resident of, nor am I regularly employed or engaged in business, professional or other activities in the State of New York.

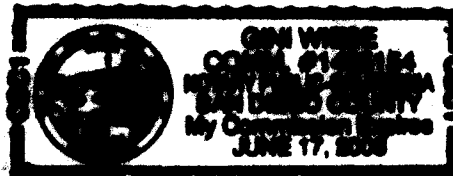
7. I hereby consent to be subject to the jurisdiction and the rules of the State of New York governing professional conduct.

  
Jay D. Hanson (JDH-4454)

STATE of California }  
County of San Diego } ss.

Sworn to before me on this  
24th day of August, 2004.

  
Notary Public



## CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

SOUTHERN DISTRICT OF CALIFORNIA

} ss.

I, W. Samuel Hamrick, Jr., Clerk of the United States District Court for the  
Southern District of California,

DO HEREBY CERTIFY That Jay D. Hanson was duly admitted to practice in said Court  
on January 20, 1990, and is in good standing as a member of the bar of said Court

Dated at San Diego, CA

W. SAMUEL HAMRICK, JR.

Clerk

on August 23, 2004

By Jamie Fachler,  
*Jamie Fachler* Deputy Clerk

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Case No. 03 CV 6978 (RCC)

**AFFIDAVIT OF CHRISTOPHER J. BEAL**

CHRISTOPHER J. BEAL, being duly sworn, deposes and says:

1. I am an associate in the law firm of Gray Cary Ware & Freidenrich LLP, attorneys for defendants African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc, Reston Investments, Inc., Safa Trust, and York Foundation (Case No. 03 CV 9849 (RCC)); International Institute of Islamic Thought (Case No. 02 CV 6977 (RCC)); and African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc., Reston Investments, Inc., Safa Trust, York Foundation, Sterling Management Group, Inc., Sterling Charitable Gift Fund, Inc., Mena Investments, Inc., Sana-bell, Inc., Jamal Barzinji, Iqbal Unus, Muhammad Ashraf, M. Omar Ashraf, Taha Jaber Al-Alwani, and M. Yaqub Mirza (Case No. 03 CV 6978 (RCC)).

2. I submit this Affidavit in support of my application to be admitted to practice before this Court and represent the above defendants, *pro hac vice*.

3. I am a member in good standing of the Bar of the Southern District of California, having been admitted to practice before that bar on December 13, 2001. A certificate of good

standing from that bar is attached hereto. I am admitted to practice law in the State of California and am an active member of the bar of that state.

4. I am not presently nor have I ever been suspended, disbarred, or otherwise disciplined in any of the courts or jurisdictions where I have been admitted to practice.

5. I certify that I have read and am familiar with the Local Rules of this District and the Federal Rules of Civil Procedure, and I agree to comply with and be bound by those rules.

6. I am not a resident of, nor am I regularly employed or engaged in business, professional or other activities in the State of New York.

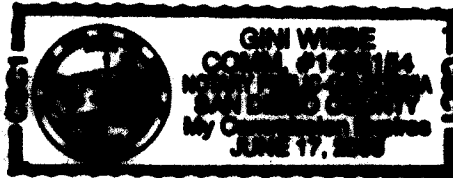
7. I hereby consent to be subject to the jurisdiction and the rules of the State of New York governing professional conduct.

STATE of California }  
County of San Diego } ss.

Sworn to before me on this  
24 day of August, 2004.

Gini Weese  
Notary Public

Christopher J. Beal  
Christopher J. Beal (CJB-1580)



# CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

SOUTHERN DISTRICT OF CALIFORNIA

} ss.

I, W. Samuel Hamrick, Jr., Clerk of the United States District Court for the  
Southern District of California,

DO HEREBY CERTIFY That Christopher J. Beal was duly admitted to practice in said  
Court on December 13, 2001, and is in good standing as a member of the bar of said Court

Dated at San Diego, CA

W. SAMUEL HAMRICK, JR.

Clerk

on August 23, 2004

By Jamie Fachler,  
*Jamie Fachler* Deputy Clerk



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**[PROPOSED] ORDER ADMITTING COUNSEL *PRO HAC VICE***

Upon consideration of the Motion for Admission Pro Hac Vice of Jay D. Hanson (JDH-4454) and Christopher J. Beal (CJB-1580), and the accompanying Affidavits of Jay D. Hanson and Christopher J. Beal, sworn to on August 24, 2004, it is hereby:

ORDERED that, pursuant to Local Civil Rule 1.3(c) of the Local Rules of this Court, Jay D. Hanson and Christopher J. Beal are hereby admitted *pro hac vice* to the bar of this Court for the purpose of representing defendants in the above-captioned proceedings and consolidated cases.

\_\_\_\_\_  
United States District Judge

Dated: \_\_\_\_\_, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of August, 2004, I caused an electronic copy of the foregoing Motion for Admission Pro Hac Vice to be served by the Court's electronic filing system upon all parties scheduled for electronic notice.

/s/ Nancy Luque  
Nancy Luque (NL-1012)